

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY CONSTRUCTION PERMIT

Permit No. **789CP01**

Final – March 25, 2003

Application No. **X154**

Administrative Revision 1, June 12, 2003

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues a construction permit to the permittee, BP Exploration (Alaska), Inc. (BPX), to install a portable flare unit and portable storage tank for the Badami RTU 3 Flare Project.

This permit satisfies the obligation of the owner and operator to obtain a construction permit as set out in AS 46.14.130(a).

As required by AS 46.14.120(c), the permittee shall comply with the terms and conditions of this construction permit.

[18 AAC 50.320(b), 1/18/97]

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John F. Kuterbach, Manager  
Air Permits Program

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### **List of Abbreviations Used in this Permit**

AAC .....	Alaska Administrative Code
ADEC.....	Alaska Department of Environmental Conservation
AS .....	Alaska Statutes
ASTM .....	American Society of Testing and Materials
C.F.R. ....	Code of Federal Regulations
COMS .....	Continuous Opacity Monitoring System
dscf.....	Dry standard cubic feet
EPA .....	US Environmental Protection Agency
gr/dscf .....	grain per dry standard cubic feet (1 pound = 7000 grains)
GPH.....	gallons per hour
HAPS .....	Hazardous Air Pollutants [hazardous air contaminants as defined in AS 46.14.990(14)]
ID .....	Source Identification Number
MACT .....	Maximum Achievable Control Technology
Mlb.....	thousand pounds
NESHAPs .....	Federal National Emission Standards for Hazardous Air Pollutants [as defined in 40 C.F.R. 61]
NSPS .....	Federal New Source Performance Standards [as defined in 40 C.F.R. 60]
PPM.....	Parts per million
PS .....	Performance specification
PSD .....	Prevention of Significant Deterioration
RM .....	Reference Method
SIC.....	Standard Industrial Classification
SO <sub>2</sub> .....	Sulfur dioxide
TPH.....	Tons per hour
TPY .....	Tons per year
VOC .....	volatile organic compound [as defined in 18 AAC 50.990(103)]
Wt% .....	weight percent

**Section 1. Identification**

**Names and Addresses**

Permittee:	BP Exploration (Alaska), Inc. 900 E. Benson Boulevard P.O. Box 196612 Anchorage, AK 99519-6612
Facility:	RTU3 Flare Badami Pipeline Tie-in
Location:	Latitude 70° 15' 17.60" N; Longitude 148° 01' 30.93" W
Physical Address:	Mile 9 Endicott Road, North Slope Alaska
Owner:	BP Exploration (Alaska), Inc. 900 E. Benson Boulevard P.O. Box 196612 Anchorage, AK 99519-6612
Operator:	BP Exploration (Alaska), Inc. 900 E. Benson Boulevard P.O. Box 196612 Anchorage, AK 99519-6612
Permittee's Responsible Official :	Janet D. Platt BP Exploration (Alaska), Inc. 900 E. Benson Boulevard P.O. Box 196612 Anchorage, AK 99519-6612
Designated Agent:	CT Corporation Service Company 801 West 10th Street Juneau, AK 99801 Phone : (907) 586 - 3340
Facility and Building Contact:	Jeff Eckstein/Murray Warren Operations Supervisor BP Exploration (Alaska), Inc. 900 E. Benson Boulevard P.O. Box 196612 Anchorage, AK 99519-6612 Phone : (907) 659 - 1322

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March 25, 2003

Alison Cooke  
BP Exploration (Alaska), Inc.  
900 E. Benson Boulevard  
P. O. Box 196612  
Anchorage, AK 99519-6612

SIC Code of the Facility: 1311 Crude Petroleum and Gas.

## **Section 2. General Emission Information**

Emissions of Regulated Air Contaminants, as provided in permittee's application:

Oxides of Nitrogen (NO<sub>x</sub>)

Carbon Monoxide (CO)

Particulate Matter (PM<sub>10</sub>)

Sulfur Dioxide (SO<sub>2</sub>)

Volatile Organic Compounds (VOC)

Construction Permit Classifications:

The RTU 3 Flare Project is classified as:

- an Ambient Air Quality Facility under 18 AAC 50.300 (b)(2), as the facility contains equipment with a rated capacity of 100 MM Btu/hr or more, and
- the permittee has requested Owner Requested Limits under 18 AAC 50.305 (a)(4) to avoid classifying this project as PSD Major Facility under 18 AAC 300(c)(1).

### **Section 3. Source Inventory and Description**

Sources listed below have specific monitoring, record keeping, or reporting conditions in this permit. Source descriptions and ratings are given for identification purposes only.

1. Within 25 days after moving Source ID 2 to the site, submit vendor diesel engine specification sheet with engine serial number, type, and diesel output no greater than 196 hp.

**TABLE 1 Source Inventory**

<b>ID</b>	<b>Source Name</b>	<b>Source Description</b>	<b>Rating/size</b>
1	Portable Flare	Halliburton Portable Flare	25 MMscf/day <sup>1</sup>
2	Portable Generator set <sup>2</sup>	Portable Generator set	196 BHP (144 kW)
3	Portable Tank <sup>3</sup>	Portable tank for crude storage	10,000 gallons [38.2 m <sup>3</sup> ]

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<sup>1</sup> Maximum rating of the flare 25 MMscf/day based on natural gas average heat content of 1020 Btu/scf; Maximum Heat Input of the flare is 1,062.50 MMBtu/hr.

<sup>2</sup> The Portable diesel generator set meets the non-road engine definition under 18 AAC 50.990 and 40 CFR 89.2. The actual and potential emissions are not included when determining permit applicability, as set out in 18 AAC 50.100.

<sup>3</sup> Portable oil storage tank is exempt from NSPS because the tank capacity is not greater than or equal to 40 cubic meters [40 C.F.R. 60 110 b].

#### **Section 4. Assessable Emissions Estimates**

- 2. Assessable Emissions.** The permittee shall pay to the department annual emission fees based on the facility's assessable emissions as determined by the department under 18 AAC 50.140. The assessable emission fee rate is set out in 18 AAC 50.410. The department will assess fees per ton of each air contaminant that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of

- 2.1 The facility's assessable potential to emit of 39 tons per year; or
- 2.2 The facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the department, when demonstrated by
  - a. An enforceable test method described in 18 AAC 50.220;
  - b. Material balance calculations;
  - c. Emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
  - d. Other methods and calculations approved by the department.

[18 AAC 50.400-420 & 18 AAC 50.346(a)(1), 8/15/02]

#### **3. Assessable Emissions Estimates**

- 3.1 No later than March 31 of each year, the permittee may submit an estimate of the facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the department can verify the estimates; or
- 3.2 If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in Condition 2.1

[18 AAC 50.400-420 & 18 AAC 50.346(a)(1),  
8/15/02]



## **Section 5. Source-Specific Requirements**

### **Fuel Burning Equipment:**

#### *Visible Emissions*

4. The permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID 1 listed Table 1 to reduce visibility through the exhaust effluent by any of the following:

- a. greater than 20% for more than three minutes in any one hour, or

[18 AAC 50.055(a)(1), 1/18/97, 40 CFR 52.70, 11/18/97]

- b. more than 20 percent averaged over any six consecutive minutes.

[18 AAC 50.055(a)(1), 18 AAC 50.346(c), 05/03/002],  
[18 AAC 50.320(a)(2), 1/18/97]

- 4.1 Monitor, record, and report visible emissions in accordance to Section 11.

[18 AAC 50.320(a)(2)(A-E), 1/18/97]

#### *Particulate Matter*

5. The permittee shall not cause or allow particulate matter emitted from Source ID 1, to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

Monitor, record, and report according to Section 11.

[18 AAC 50.055(b)(1), 1/18/97]  
[18 AAC 50.320(a)(2), 1/18/97]  
[18 AAC 50.320(a)(2)(A-E), 1/18/97]

#### *Sulfur Compound Emissions*

6. The permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from Source ID 1, to exceed 500 PPM averaged over three hours.

[18 AAC 50.055(c), 1/18/97]  
[18 AAC 50.320(a)(2), 1/18/97]

- 6.1 Compliance with this condition is assured by using natural gas with hydrogen sulfide content not exceed 500 ppm volume.

- 6.2 Obtain a copy of the Badami Gas Analysis conducted in accordance with Air Quality Construction permit No. 0173-AC005, Condition No. VI. B 5.
- 6.3 Report under Condition 17 whenever flaring natural gas fuel that does not meet the requirements of Condition 6.1.
- 6.4 Include in the report required by Condition 18 a copy of the Badami Gas Analysis of the flared gas during the reporting period, and any reports required by Condition 6.3.

[18 AAC 50.320(a)(2)(A-E), 1/18/97]

**Section 6.        *Conditions to Protect the Ambient Air Quality:***

7.    Limit the total flare throughput capacity to no greater than 25 million standard cubic feet of all gases per 24 hours

[18 AAC 50.320(a)(2)(A-E), 1/18/97]

***Section 7. Emission and Operation Limits to Avoid Classification as a PSD Major Facility***

The following conditions are necessary to limit facility emissions to less than 250 tons per year.

8. Limit the total flare operations, Source ID 1, no greater than 200 hours in any 12-month rolling period.
  - a. Monitor and record the hours of operations as set out in Condition 18.
9. The portable petroleum storage tank, Source ID 3, shall have a capacity not greater or equal to 10,000 gallons [38.2 m<sup>3</sup>].

## **Section 8. Generally Applicable Requirements**

- 10. Good Air Pollution Control Practice.** The permittee shall install, maintain, and operate, in accordance with manufacturer's or the permittee's procedures, fuel burning equipment, process equipment, emission control devices, testing equipment, and monitoring equipment to provide optimum control of air contaminant emissions during all operating periods. This condition is not federally enforceable.

[18 AAC 50.030, 1/18/97]  
[18 AAC 50.320(a)(2)(A), 1/18/97]

- 11. Modification.** The permittee shall not construct, operate, or modify a source that will result in a violation of the applicable emission standards or that will interfere with the attainment or maintenance of the ambient air quality standards or maximum allowable ambient concentrations.

[18 AAC 50.045(c), 1/18/97]  
[18 AAC 50.320(a)(2), 1/18/97]

- 11.1 Obtain all permits or permit revisions required for construction, modification, or operation under 18 AAC 50 and AS 46.14.

[18 AAC 50.320(a)(2), 1/18/97]

- 11.2 Comply with the conditions of all permits obtained under 18 AAC 50 and AS 46.14.

[18 AAC 50.320(a)(2), 1/18/97]

- 12. Air Pollution Prohibited.** The permittee shall not cause any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.

[18 AAC 50.110]

## **13. Monitoring, Record Keeping, and Reporting for Air Pollution Prohibited.**

- 13.1 If emissions present a potential threat to human health or safety, the permittee shall report any such emissions according to condition.

- 13.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the permittee shall investigate the complaint to identify emissions that the permittee believes have caused or are causing a violation of Condition 12.

- 13.3 The permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if

- a. After an investigation because of a complaint or other reason, the permittee believes that emissions from the facility have caused or are causing a violation of Condition 12; or

- b. The department notifies the permittee that it has found a violation of Condition 12.

13.4 The permittee shall keep records of

- a. The date, time, and nature of all emission complaints received;
- b. The name of the person or persons that complained, if known;
- c. A summary of any investigation, including reasons the permittee does or does not believe the emissions have caused a violation of Condition 12; and
- d. Any corrective actions taken or planned for complaints attributable to emissions from the facility.

13.5 With each facility operating report under condition 18, the permittee shall include a brief summary report which must include:

- a. The number of complaints received;
- b. The number of times the permittee or the department found corrective action necessary;
- c. The number of times action was taken on a complaint within 24 hours; and
- d. The status of corrective actions the permittee or department found necessary that were not taken within 24 hours.

13.6 The permittee shall notify the department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the permittee has initiated corrective action within 24 hours of receiving the complaint.

[18 AAC 50.346(a)(3)]

## **Section 9. General Record Keeping, Reporting, and Compliance Certification Requirements**

- 14. Certification.** The permittee shall certify all reports, compliance certifications, or other documents submitted to the department under the permit by including the signature of a responsible official for the permitted facility following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notarized.

[18 AAC 50.205, 1/15/02]  
[18 AAC 50.345(j), 7/11/02]  
[18 AAC 50.320(a)(2)(E), 8/15/02]

- 15. Submittals.** Unless otherwise directed by the department or this permit, the permittee shall send reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Office, 610 University Avenue, Fairbanks, AK 99709.

[18 AAC 50.320(a)(2)(E), 8/15/02]

- 16. Information Requests.** The permittee shall furnish to the department, within a reasonable time, any information the department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit, or to determine compliance with the permit. Upon request, the permittee shall furnish to the department copies of records required to be kept by this permit. The department may require the permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.200, 8/15/02]  
[18 AAC 50.345(i), 8/15/02]  
[18 AAC 50.320(a)(2) & 18 AAC 50.320(a)(2)(A-E), 8/15/02]

### **17. Excess Emissions and Permit Deviation Reports.**

- 17.1** Except as provided in Condition 13, the permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
  - (i) emissions that present a potential threat to human health or safety; and
  - (ii) excess emissions that the permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;

- c. report all other excess emissions and permit deviations
  - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 17.1c(ii), and 17.1c(iii),
  - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the department provides written permission to report under condition 17.1c(i).
  - (iii) for failure to monitor, as required in other applicable conditions of this permit.

17.2 When reporting excess emissions, the permittee must report using either the department's online form, which can be found at [www.dec.state.ak.us/awq/excess/report.asp](http://www.dec.state.ak.us/awq/excess/report.asp), or, if the permittee prefers, the form contained in Section 13 of this permit. The permittee must provide all information called for by that form that is used.

17.3 When reporting a permit deviation, the permittee must report using the form contained in Section 13 of this permit. The permittee must provide all information called for by the form.

17.4 If requested by the department, the permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

**18. Facility Operating Reports.** The permittee shall submit an original and two copies of an operating report by August 1 for the period January 1 to June 30, and by February 1 for the period July 1 to December 31. This report must include copies of the records required to be reported by the conditions of this permit. In addition, in accordance with condition 17 "*Excess Emissions and Permit Deviation Reports*," the report must include a listing of all dates of deviation and excess emissions during the reporting period. If the permittee is certifying the excess emission and permit deviation report pursuant to condition 14 "*Certification*," then a copy of each excess emission and permit deviation report must be attached to the operating report.

[18 AAC 50.320(a)(2)(A-E), 8/15/02]



**Section 10. Standard Conditions Not Otherwise Included in the Permit**

19. Consistent with Alaska law, for purposes of submitting compliance certifications or establishing whether or not the permittee has violated or is in violation of any standard in this permit, nothing in this permit precludes the use of any credible evidence of information relevant to whether the facility would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[18 AAC 50.320(a)(2), 1/18/97]  
[Federal Citation: 40 C.F.R. 52.12(c), 7/1/99]

20. The permittee must comply with each permit term and condition. Noncompliance with constitutes a violation of AS 46.14, this chapter, and except for those terms and requirements designated in the permit as not federally-enforceable, the Clean Air Act, and is grounds for:

20.1 an enforcement action,

20.2 permit termination, revocation and re-issuance, or modification in accordance with AS 46.14.280, or

20.3 denial of a construction permit renewal application.

[18 AAC 50.345(a)(1), 8/15/02]  
[18 AAC 50.320(a)(1), 8/15/02]

21. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

[18 AAC 50.345(d), 8/15/02]  
[18 AAC 50.320(a)(2), 8/15/02]

22. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of this permit.

[18 AAC 50.345(a)(3), 8/15/02]  
[18 AAC 50.320(e), 8/15/02]

23. Compliance with permit terms and conditions is considered to be compliance with those requirements that are:

23.1 included and specifically identified in the permit, or

23.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.345(b), 8/15/02]  
[18 AAC 50.320(a)(2), 8/15/02]

- 24.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the permittee for modification, revocation and re-issuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any construction permit condition.

[18 AAC 50.345(f), 8/15/02]  
[18 AAC 50.320(a-c), 8/15/02]

- 25.** The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.345(g), 8/15/02]  
[18 AAC 50.320(b), 8/15/02]

- 26.** The permittee shall allow an officer or employee of the department or an inspector authorized by the department, upon presentation of credentials and at reasonable times, with the consent of the owner or operator, to:

- 26.1 enter upon the premises where a source subject to the construction permit is located or where records required by the permit are kept,
- 26.2 have access to and copy any records required by the permit,
- 26.3 inspect any facilities, equipment, practices, or operations regulated by or referenced in the permit, and
- 26.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.345(h), 8/15/02]  
[18 AAC 50.320(a)(2), 8/15/02]

## **Section 11. Visible Emissions and Particulate Matter Monitoring Plan**

### **Visible Emissions Observations**

**27.** Preliminary Visible Emissions observations shall be performed during the initial startup of the portable flare installation Source ID 1. Observe its exhaust for 18 minutes to obtain individual 15 second readings in accordance with Section 12 of this permit; OR

27.1 Each day that a source operates, observe the exhaust for the presence or absence of visible emissions, excluding condensed water vapor. Record the following information in a written log for each observation:

- a. The date and time of the observation,
- b. From TABLE 1 of this permit, the ID of the source observed,
- c. Whether visible emissions are present or absent in the exhaust,
- d. If the source starts operation on the day of the observation, the startup time of the source, and
- e. Name, title, and signature of the person making the observation.

### **Corrective Actions Based on Visible Emissions Observations**

**28.** If visible emissions are present in the exhaust during an observation performed under Condition 27.1, the permittee shall:

28.1 Take actions to reduce visible emissions from the source within 24 hours of the observation;

28.2 Keep a written record of the starting date, the completion date, and a description of the actions taken to reduce visible emissions; and

28.3 After completing the actions taken to reduce visible emissions, observe the visible emissions in accordance with Condition 27.1. If visible emissions are present in the exhaust during any of the next 30 observations, observe the exhaust in accordance with Condition 27 no later than 2 calendar days after the visible emissions are first observed.

### **Reporting Requirements**

**29.** The permittee shall report as set out in Condition 18 the 18 minutes visible emission observation during the initial start-up of the flare, or copies of smoke no-smoke logs and corrective actions summary if applicable.

**30.** The permittee shall submit a report in accordance with Condition 17 if:

30.1 The 18-minute visible emission observation results in

- a. 13 or more 15-second readings with an opacity greater than 20%;
- b. six-minute average opacity that is greater than 20%.

## **Section 12. Visible Emission Evaluation Procedures**

An observer qualified according to 40 C.F.R. 60, RM 9 shall use the following procedures to determine the reduction of visibility through the exhaust effluent.

**Position.** The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented in the 140° sector to his back. Consistent with maintaining the above requirement, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the plume direction and, when observing opacity of emissions from rectangular outlets (e.g., roof monitors, open baghouses, noncircular stacks), approximately perpendicular to the longer axis of the outlet. The observer's line of sight should not include more than one plume at a time when multiple stacks are involved, and in any case the observer should make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks (e.g., stub stacks on baghouses). The observer shall maintain a distance of at least 15 feet from the emission point.

**Field Records.** The observer shall record the name of the plant, emission location, facility type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet. The time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), and plume background are recorded on the sheet at the time opacity readings are initiated and completed.

**Observations.** Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The observer shall not look continuously at the plume, but instead shall observe the plume momentarily at 15-second intervals. Unless directed to do otherwise in this permit, observe emissions for 60 consecutive minutes to obtain a minimum of 240 observations.

**Attached Steam Plumes.** When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.

**Detached Steam Plume.** When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions should be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.

**Recording Observations.** Opacity observations shall be recorded to the nearest 5 percent at 15-second intervals on the Visible Emissions Observation Record contained in this section. Record the minimum number of observations required by the permit. Each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

**Data Reduction.** To determine compliance with a standard set out in Condition 1 of this permit, count the number of observations that exceed 20 percent opacity and record this number on the sheet.

To determine the six-minute average opacity set out in Condition 4 of this permit, divide the observations recorded on the record sheet into sets of 24 consecutive observations. Sets need not be consecutive in time, and in no case shall two sets overlap. For each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24. If an applicable standard specifies an averaging time requiring more than 24 observations, calculate the average for all observations made during the specified time period. Record the average opacity on the sheet.

Certified Observer: \_\_\_\_\_

Company: \_\_\_\_\_

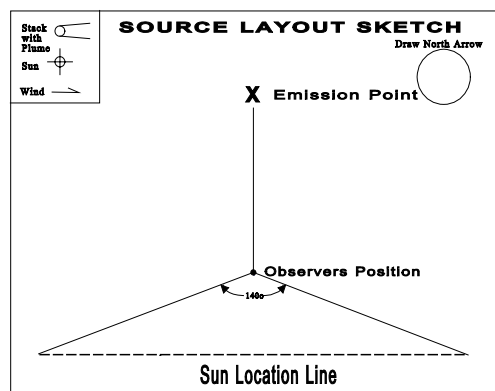
Location: \_\_\_\_\_

Test No.: \_\_\_\_\_ Date: \_\_\_\_\_

Source: \_\_\_\_\_

Production Rate, Operating Rate &  
Unit Operating Hours: \_\_\_\_\_

Hrs. of observation: \_\_\_\_\_



Clock Time	Initial				Final
Observer location					
Distance to discharge					
Direction from discharge					
Height of observer point					
Background description					
Weather conditions					
Wind Direction					
Wind speed					
Ambient Temperature					
Relative humidity					
Sky conditions: (clear, overcast, % clouds, etc.)					
Plume description:					
Color					
Distance visible					
Water droplet plume? (attached or detached?)					
Other information					

Page of

Test Number \_\_\_\_\_ Clock time \_\_\_\_\_

[illegible]

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Observer Signature

Number of Observations exceeding 20% \_\_\_\_\_

Set Number	Time Start—End	Opacity	
		Sum	Average



### Section 13. ADEC Notification Form

Fax this form to: (907) 269-7508 Telephone: (907) 269-8888

BP Exploration (Alaska), Inc.  
Company Name

RTU 3 Flare  
Facility Name

#### Reason for notification:

☐ **Excess Emissions**

*If you checked this box  
Fill out section 1*

☐ **Other Deviation from Permit Condition**

*If you checked this box  
fill out section 2*

When did you discover the Excess Emissions or Other Deviation:

Date: \_\_/\_\_/\_\_ Time:\_\_:\_\_

#### Section 1. Excess Emissions

##### (a) Event Information (Use 24-hour clock):

	START Time: (hr:min):	END Time:	Duration
Date: _____	_____:_____	_____:_____	_____:_____
Date: _____	_____:_____	_____:_____	_____:_____
		<b>Total:</b>	_____:_____

##### (b) Cause of Event (Check all that apply):

<input type="checkbox"/> START UP	<input type="checkbox"/> UPSET CONDITION	<input type="checkbox"/> CONTROL EQUIPMENT
<input type="checkbox"/> SHUT DOWN	<input type="checkbox"/> SCHEDULED MAINTENANCE	<input type="checkbox"/> OTHER _____

*Attach a detailed description of what happened, including the parameters or operating conditions exceeded.*

##### (c) Sources Involved:

*Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.*

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____

##### (d) Emission Limit Potentially Exceeded

*Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.*

Permit Condition	Limit	Emissions Observed
_____	_____	_____
_____	_____	_____

##### (e) Excess Emission Reduction:

*Attach a description of the measures taken to minimize and/or control emissions during the event.*

**(f) Corrective Actions:**

*Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.*

**(g) Unavoidable Emissions:**

*Do you intend to assert that these excess emissions were unavoidable?*

☐ YES ☐ NO

*Do you intend to assert the affirmative defense of 18 AAC 50.235?*

☐ YES ☐ NO

**Section 2. Other Permit Deviations**

**(a) Sources Involved:**

*Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.*

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**(b) Permit Condition Deviation:**

*Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.*

Permit Condition	Potential Deviation
_____	_____
_____	_____
_____	_____

**(c) Corrective Actions:**

*Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.*

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_